



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

APR 22 2005

CAD 050 806 850
Permit C 4A-1

Mr. Brian Olson
Plant General Manager
Clean Harbors Environmental Services, Inc.
5756 Alba Street
Los Angeles, CA 90058

Re: Follow-Up To October 5, 2004 TSCA Inspection

Dear Mr. Olson:

EPA performed a TSCA PCB inspection at your facility on October 5, 2004. The inspection, and subsequent record review, identified several issues that require resolution. Please provide information that would enable EPA to resolve the following three issues.

In response to our request for your facility's current hazardous waste permit, EPA received a permit titled "Final Hazardous Waste Facility Permit Modification" (EPA ID No. CAD050806850) issued by the California Department of Toxic Substances Control. The permit has an effective date of February 28, 1995 and an expiration date of May 29, 1995. Please provide a copy of the current hazardous waste permit.

The hazardous waste manifests provided in response to the inspection describe waste in terms of types of containers and weight or number of items. The permit specifies the maximum storage quantity in terms of volume. Please explain how you determine the waste volume based on the manifest descriptions as well as the maximum PCB waste quantity at the facility.

One reason EPA performed the inspection was to assess whether your facility is eligible to operate as a PCB Commercial Storer under the provisions at 40 CFR 761.65(d)(6) which allows storage areas at RCRA-permitted facilities to be exempt from a separate TSCA storage approval. To qualify, this provision requires that EPA evaluate the following information:

- 1) whether your RCRA closure plan is substantially equivalent to TSCA's closure plan standards,
- 2) whether your RCRA closure cost estimate and financial assurance accounts for the maximum PCB waste inventories,
- 3) the identities of the facility owner, operator, any partners, stockholders, as well as managers, and supervisors (761.65(d)(3)(i))

4) the identities of the people responsible for the overall operations of the facility (i.e., a plant manager, superintendent, or person of similar responsibility) and supervisory employees responsible for the operation of the facility. (761.65(d)(3)(ii)) and

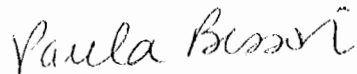
5) information regarding the technical qualifications and experience of the people responsible for the overall operation of the facility and employees responsible for handling PCB or other wastes. (761.65(d)(3)(iii))

This provision also allows a pay-in period of longer than 3 years after approval of the storage facility if that pay-in period has already been established for a valid RCRA facility or previously approved TSCA facility. (761.65(d)(6)).

Please provide the information listed in items 1-5 above as well as any other information that will allow us to determine whether Clean Harbors meets the requirements of 761.65(d)(6).

For questions regarding this letter, please contact Yosh Tokiwa at (415) 947-4172 or Max Weintraub at (415) 947-4163.

Sincerely,

A handwritten signature in cursive script that reads "Paula Bisson".

Paula Bisson
Manager, Toxics Office
Communities and Ecosystems Division